

1897-064 Chancery Causes: William Wilson vs Jennie Wilson
Lee Co.

Rollins, Wells, Mullins, Willson

CA-Divorce
T-Vices

Virginia,

In the Circuit Court of Lee County.

To the Hon. W. T. Miller, Judge of said Court:

-----Humbly complaining, your orator, William Wilson, would respectfully represent and shew unto your Honor, that on the ____ day of ____ 189____, he was married to one Jennie Rollins, who is now his wife, and with whom he lived for a few years, as he thought happily and contented until a few months ago, when his said wife abandoned him for the society of other men, and the association of lewd women. Your orator did all that he could to make his said wife happy and contented, and was faithful to his marriage vows, but his said wife was unfaithful to him, and committed the crime of adultery, much to his sorrow and surprise.

Your orator alleges that his said wife is guilty of the crime of adultery, *with one Mrs. Collins at the house of Plaintiff in January 1897, and in the woods near the residence of the Plaintiff in the same year with one Wiley Cantel.* and that she committed the same without his consent, procurement or connivance, and that the same was committed within five years of the institution of this suit. And he also alleges that since it came to his knowledge that his said wife was untrue to him, unfaithful to her marital vows and guilty of the crime of adultery, he has not lived with or cohabited with her. Your orator further alleges that he is now and has been for more than twelve months next preceeding the bringing of this suit a citizen of the County of Lee and State of Virginia.

-----Now, therefore, the object of this bill is to obtain a divorce a vinculo matrimonii from the bonds of matrimony heretofore contracted and now existing between him and his said wife. To this end he makes the said Jennie Wilson the party defendant to this bill, and asks that she be required to answer the same, but not on oath that being waived; and that upon a hearing a decree be pronounced granting him a divorce a vinculo matrimonii from the said bonds of matrimony. And that he be granted general relief. May process issue, directed, etc. And your orator will ever pray, etc.

Wm. + Blauveltship, P. Q.

O. & B.

William Willson

vs. Bill in Chy.

Jennie Willson.

1897. 2nd March rules
bill filed + Spa. Exd
" 1st April rules Cause
Set for hearing.

The Commonwealth of Virginia,

To the Sheriff of the County of Lee---Greeting:

We Command you, That you summon

Jennie Wilson

to appear at the Clerk's Office of the Circuit Court of the County of Lee, at the rules to be held
for the said Court on the *3rd* Monday in *March*, 189*7*, to answer a
bill in Chancery, exhibited against *her* in our said court by

William Wilson

And have then there this writ. Witness, A. B. MUNSEY, Clerk of our said Court, at the court-
house, the *24th* day of *February*, 189*7*, and in the
12th year of the Commonwealth.

A. B. Munsey Clerk.

William Wilson

SUPREMA.

vs. }

IN CHANCERY.

Jennie Wilson

Orr + B

p. q.

To 2nd March Rules.

CIRCUIT COURT.

Executed Feb 28-
1897 by delivering
an attested office
of the within
summons to
Jennie Wilson
W. P. Weston S.C.

William Willson, Plaintiff.

Against (In Chancery.

(Decree ~~final~~ final.)

Jennie Willson, Defendant.

This cause came on this day to be heard upon the bill of the Plaintiff, subpoena in Chancery duly executed, and the cause regularly matured at Rules and set for hearing, the depositions of ^{witnesses} ~~witnesses~~ and the argument of counsel for Plaintiff, and the Defendant not having appeared and demurred, plead or answered the said bill---Upon consideration of all which, the charge of Adultery in complainant's bill being fully proved, the Court doth adjudge, order and decree that ~~thaxx~~ the bonds of matrimony heretofore contracted and existing between the Plaintiff, William Willson, and the Defendant, Jennie Willson, be, and the same are hereby dissolved, and a divorce a vinculo matrimonii is granted both parties . And the cause is stricken from the docket.

William Wilson

vs. } been

Jennie Wilson

C.O.B. p. 593-4
28 32

Enter June 10/97

W. F. M.

To Mrs. Jennie Wilson:-

-----You are hereby notified that on the 12th day of May 1897, at the law office of Orr & Blankenship in Jonesville, Lee County, Virginia, between the hours of 8 A. M. and 4 P. M., of that day, I shall proceed to take the depositions of Joe Sexton and others, to be read as evidence in my behalf, in a certain ~~action in Chancery~~ suit in Chancery, depending in the Circuit Court for the County of Lee, and State of Virginia, wherein I am Plaintiff, and you are Defendant; and if from any cause the taking of the said depositions be not commenced, or if commenced, be not concluded on that day, the taking thereof will be adjourned from day to day and from place to place, or at the same place between the same hours, until the same shall be completed. This the 26th day of April 1897.

William Wilson

-----By-----

Orr & Blankenship,
his Attorneys.

10.4 B.

William Wilson

vs. { notice to take
depositions.

Jennie Wilson.

Executed by delivering a copy
of the within summons to
Jennie Wilson. This April
29-1897 J.M. Weston
R.S. for W.P. Weston
S.L.C.

William Willson, Plaintiff.

Against (In Chancery. (Circuit Court of Lee County.)

Jennie Willson, Defendant.

-----The depositions of J. L. Wells, ^{Law} Sarah Mullins ~~and William Willson~~ taken at the office of Orr & Blankenship, in the town of Jonesville, Lee County, Virginia, pursuant to notice hereto attached, on this the 12th day of May 1897, before me, H. C. Joslyn, a Justice of the Peace in and for the County and State aforesaid, to be read as evidence on behalf of the Plaintiff in a certain suit in Chancery now pending in the Circuit Court of Lee County, Virginia, wherein William Willson is Plaintiff and Jennie Willson is Defendant.

Present: William Willson, Plaintiff, and Orr & Blankenship, his ~~counsel~~ counsel.

J. L. Wells, a witness of law ful age being ~~duly~~ first duly sworn deposes and says:-

Ques. 1. By Counsel for Plaintiff.

State your age, occupation and place of residence ?

Ans. I am 21 years old, occupation a farmer, and live near Van, Lee County, Virginia.

Ques. 2. Are you acquainted with William Willson and Jennie Willson, the Plaintiff and Defendant to this suit ? If so how long have you known them ?

Ans. I am acquainted with both the Plaintiff and Defendant and have known them about three years.

Ques. 3. State whether or not if you know if they onced lived together as man and wife, if you answer they, state if you know how long they lived together as man and wife, and whther or not they are now so living, if not, why not ? Also state where each resides at this time ?

Ans. They once lived together as man and wife; I saw them married. They lived together as man and wife near three years, they are not living together ~~now~~ now; they have been separated from each other some three or four months; William Willson the Plaintiff now lives near Van, Lee County, Virginia; Jennie Willson, the Defendant is living near Crab Orchard, Lee County, Virginia.

Ques. 4. State if you ever seen any acts of lewdness or adultery by the said Jennie Willson after her marriage, and if so, state what they were, with whom, and all you may know about it ?

Ans. I seen her in bed with William Collins at her house, she had off her clothes, and he was also undressed, they remained in bed together about all night. I was ~~stayed~~ ~~stayed~~

about all night. I was sleeping in the same room. William Willson was not at home, he had gone to his Father's some seven or eight miles away. It was some 8 or 9 O'clock when I saw him get in bed with her; Orville Bolin, Sarah Mullins and my self were also sleeping in the same room. I saw ~~xxxxxx~~ Jennie Willson and Wiley Combs out together in the woods near where she lived. I saw ~~xxxx~~ them lying down, he on top of her and she with her clothes up, actually as I thought and believed at the time having carnal communication with each other. I also know of her leaving home with Will Collins and remaining away a day and night.

Ques. 5. Has the Plaintiff lived or co-habited with the Defendant since the conduct of the Defendant you speak of came to his knowledge?

Ans. He has not. I live with Mr. William Willson and ~~now~~ know that he has not lived with her. I told the Plaintiff of the conduct of his wife. I thought it was my duty to do so. Since that time they have been living apart.

Ques. 6. State if you know how long the Plaintiff has been a resident of ~~xxxxxx~~ Lee County, Virginia?

Ans. The Plaintiff, William Willson, is now a resident of Lee County, Virginia, and has been ever since I become acquainted with him some three years ago.

Ques. ~~What~~ State if you know what has been the conduct and treatment of the Plaintiff to the Defendant?

Ans. The Plaintiff treated his wife in a kind manner and provided for her as abundantly as his means would permit, he is a poor man, but a hardworking man, and I always thought he treated his wife kindly and properly in ever respect. I have been living with them off and on for about two years, and before I went to live with them I was about their house frequently.

Ques. 8. State if you know whether the above adulterous acts and conduct of the said Jennie Willson was committed without the procurement, connivance and consent of her husband, William Willson?

Ans. The adulterous acts and conduct of the Defendant was committed without the knowledge, procurement, connivance, or consent of her husband. When he heard of it, he was very much mortified and troubled and has refused to live with or have anything to do with her ever since.

-----And ~~xxxxxx~~ further this deponent saith not.

Witness Claim
1 day Paid by
the Ref. 50 cts.

J. L. Wells
mark

Sarah Mullins, another witness of lawful age being first duly sworn ~~and~~ deposes as follows

Ques. Please state whether or not you are acquainted with William Willson and Jennie Willson; if you answer you are, state how long you have known them? Also state your age and place of residence?

Ans. I am acquainted with both William and Jennie Willson; have known William five years or more, and Jennie about one year. My age is 23 years, and I live near Van, Lee County, Virginia.

Ques. 2. State if you ever saw any unbecoming conduct committed by the Defendant, Jennie Willson, and if you answer you have, state when it was, where it was, how you came to know ~~an~~ of it and all about it?

Ans. In January 1897, I went to William Willson's house to stay all night, when I got there ~~he~~ ~~xxxx~~ he was not at home, his wife, Jennie,

was at home, Scott Sexton, William Collins, were there, Sexton lived there and was working for Mr. Willson. A while after dark we all ~~retired~~ retired, Sexton and Collins sleeping together in one bed, Jennie Willson in another, and I slept on a lounge by myself and my two small children, sometime after we had gone to bed, Collins got up complaining of tooth ache and was sitting by the fire, Jennie said to him she was cold and that she wished he would "come or go one" and then Collins got up and went and got in the bed with her. Before she said this to Collins she remarked that Sarah and Scott were sleeping mighty good. I went to sleep and do not know how long they remained in bed together, they were each undressed, and I saw him get under the cover with her. She told me one day that she was going up in the ridge to meet Collins, I seen her start and seen them come back together, or he came in first and she just after him.

Ques. 3 Is the Plaintiff and Defendant now living together as man and wife, if you answer they are not, please state if you know, how long they have been separated?

Ans. They are not living together and have been separated some two or three months.

Ques. 4. Is the Plaintiff a resident of Lee County, Virginia, if you answer that he is, please state if you know, how long he has been a resident of said county and state?

Ans. He is a resident of Lee County, Virginia, and has lived here ever since I have known him. Mr. Willson was kind to his wife, and her conduct was without his knowledge, procurement, connivance or consent.

-----And further this deponent saith no t.

*Witness claims 1 day 50 cts.
Paid by Plff.*

Sarah ^{her} Mullins
mark

Virginia, Lee County, to-wit:-

I, H. C. Joslyn, a Justice of the Peace, in and for the County and State aforesaid, do hereby certify that the foregoing depositions of J. L. Wells and Sarah Mullins were duly taken, sworn to and subscribed before me, at the time and place and for the purposes mentioned in the caption of the same. Given under my hand this the 12th day of May ~~1897~~ 1897.

H. C. Joslyn
J. P. in and for Lee County, Va.

William Willson
v.s. 3 L. Chcy.
Jennie Willson

The depositions
of J. L. Wells &
Sarah Mullins

Received from H. C. Joslyn
the J.P. before whom taken
& filed May 12th 1897
A. B. Munsey Clerk

J. P. Lee

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